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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 11-0536 WHA
	)	
Plaintiff,	)	
	)	STIPULATION AND <del>PROPOSED</del> ORDER
v.	)	CONTINUING MATTER AND EXCLUDING
	)	TIME UNDER 18 U.S.C. § 3161
	)	
JOSEPH PERKINS,	)	
	)	
	)	
Defendant.	)	
_____	)	

On October 11, 2011, the parties made their initial appearance before the Court. The parties requested, and the Court ordered, a continuance until November 1, 2011, on which date the parties anticipate a change of plea. The stated purpose of the continuance request was to afford defense counsel adequate time to prepare.

The parties also requested, and the Court ordered, that the time between October 11 and November 1, 2011, would be excluded from the running of the speedy trial clock for effective

1 preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that, taking into  
2 account the public interest in prompt disposition of criminal cases, good cause exists for this  
3 extension. The parties also agreed that the ends of justice served by granting such a continuance  
4 outweighed the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §  
5 3161(h)(7)(A).

6 SO STIPULATED:

7  
8 MELINDA HAAG  
United States Attorney

9  
10 DATED: October 17, 2011

11 /s/  
BENJAMIN P. TOLKOFF  
Assistant United States Attorney

12  
13 DATED: October 17, 2011

14 /s/  
RONALD TYLER  
Attorney for JOSEPH PERKINS

15 For the reasons stated above, this matter is continued until November 1, 2011, for a  
16 change of plea or trial setting. The Court finds that the exclusion of time from October 11,  
17 through November 1, 2011 is warranted and that the ends of justice served by the continuance  
18 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161  
19 (h)(7)(A). The failure to grant the requested continuance would deny the defendant effective  
20 preparation of counsel and would result in a miscarriage of justice. 18 U.S.C. §  
21 3161(h)(7)(B)(iv).

22 SO ORDERED.

23  
24 DATED: November 18, 2011.

25   
26 William Alsup  
27 UNITED STATES DISTRICT JUDGE  
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